

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

IN RE:

LAPEER INDUSTRIES, INC

Case No. 20-48744
Chapter 11 proceeding

Debtor.

Judge: Maria L. Oxholm

NOTICE OF DEBTOR'S SECOND MOTION FOR ENTRY OF AN ORDER (I) APPROVING BIDDING PROCEDURES, (II) SCHEDULING AN AUCTION AND A SALE HEARING IN CONNECTION WITH THE SALE OF SUBSTANTIALLY ALL OF DEBTOR'S ASSETS, (III) ESTABLISHING DATES AND DEADLINES IN CONNECTION WITH THE SALE, (IV) APPROVING THE FORM OF THE ASSET PURCHASE AGREEMENT, AND (V) GRANTING RELATED RELIEF; AND FOR ENTRY OF AN ORDER (A) AUTHORIZING THE SALE OF SUBSTANTIALLY ALL OF DEBTOR'S ASSETS FREE AND CLEAR OF LIENS, CLAIMS, ENCUMBRANCES, AND INTERESTS, AND (B) APPROVING THE ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND UNEXPIRED LEASES, AND (C) GRANTING RELATED RELIEF; AND FOR ENTRY OF AN ORDER ESTABLISHING AN ADMINISTRATIVE CLAIMS BAR DATE AND OPPORTUNITY TO RESPOND

Debtor, through counsel, has filed papers with the Court requesting entry of a bidding procedures order, which contains the sale and bidding procedures to be followed in connection with Debtor's proposed sale of assets.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief requested in the motion, or if you want the court to consider your views on the motion, within **14 days OR SUCH SHORTER TIME PERIOD THAT MAY BE SET BY THE COURT**, you or your attorney must:

1. File with the court a written response or an answer, explaining your position at:¹

¹Any response must comply with F. R. Civ. P. 8(b), (c) and (e).

United States Bankruptcy Court
211 West Fort Street
Detroit, Michigan 48226

If you mail your response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. All attorneys are required to file pleadings electronically.

You must also mail a copy to:

Winegarden, Haley, Lindholm,
Tucker & Himelhoch, PLC
Attn: Zachary R. Tucker
9460 S. Saginaw Rd., Suite A
Grand Blanc, MI 48439

2. If a response or answer is timely filed and served, the clerk will schedule a hearing on the Motion and you will be served with a notice of the date, time and location of the hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion and may enter an order granting that relief.

Respectfully Submitted,
WINEGARDEN, HALEY, LINDHOLM,
TUCKER & HIMELHOCH, P.L.C.
Attorneys for the Debtor

Dated: January 26, 2021

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